

# **Exhibit A**

Topic / Allegation	Gannett Allegation	Daily Mail Allegation	Prior Motion to Dismiss Daily Mail's Argument Incorporated	Relevant Passages of the Court's MTD Op. Dismissing the Allegations
<b>Exchange Bidding Harms Competition by Seeking to “Kill” Header Bidding</b>	<p>Gannett alleges that Google designed and launched Exchange Bidding to negatively impact client-side header bidding. Compl. ¶¶ 179-81.</p> <p>Gannett further alleges that Google has taken steps to “coerce” publishers to abandon client-side header bidding for Exchange Bidding. <i>Id.</i> ¶ 182. According to Gannett, this coercion took the form of false sales representations. <i>Id.</i> ¶¶ 183-86.</p>	<p>Same. Daily Mail Compl. ¶¶ 159, 161-62.</p> <p>Same. <i>Id.</i> ¶ 163.</p>	MTD Daily Mail Compl. at 3-6	MTD Op. at 61-66
<b>Encryption of User IDs Harms Competition by Blocking Rivals’ Access</b>	<p>Gannett alleges that Google encrypts user IDs such that publishers cannot use the data to solicit targeted ads from advertisers, imposing financial harm on Gannett. Compl. ¶¶ 131-32.</p> <p>Gannett further alleges that Google’s stated rationale for encrypting user IDs—protecting user privacy—is irrational, but for its effect on rival ad exchanges. <i>Id.</i> ¶¶ 133-35.</p>	<p>Same. Daily Mail Compl. ¶¶ 110-11.</p> <p>Same. <i>Id.</i> ¶¶ 112-13.</p>	MTD Daily Mail Compl. at 6-9	MTD Op. at 40-44

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<b>Accelerated Mobile Pages (“AMP”) Harms Competition Through Its Incompatibility with Header Bidding</b>	<p>Gannett alleges that Google has leveraged its supposed “Search monopoly” to force publishers to adopt Accelerated Mobile Pages (“AMP”). Compl. ¶¶ 223-26.</p> <p>Gannett further alleges that Google has made AMP, and thus AMP inventory, incompatible with client-side header bidding, insulating AdX from competition. <i>Id.</i> ¶¶ 230, 233-35.</p>	<p>Same. Daily Mail Compl. ¶¶ 201-04.</p> <p>Same. <i>Id.</i> ¶¶ 206, 209-10, 212.</p>	<p>MTD Daily Mail Compl. at 9-12</p>	<p>MTD Op. at 70-72</p>